

REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 25.120 of the Commission's rules and out of an abundance of caution,¹ the American Samoa Telecommunications Authority ("ASTCA") requests a 30-day extension of its special temporary authorizations ("STAs")² to operate a temporary fixed satellite service ("FSS") VSAT network system in the 19.8-19.95 GHz and 29.6-29.7 GHz bands at the following locations in the Manu'a Islands:

Requested Locations for VSATs ³		
Location	Latitude	Longitude
Ofu	14° 10' 32.72" S	169° 37' 30.23" W
Ta'u	14° 13' 24.88" S	169° 30' 40.69" W

Operations would continue pursuant to the technical parameters of ASTCA's previously granted STAs and filed extension requests.⁴ Therefore, antenna information would include the following, which applies to both locations:

Antenna Information ⁵	
VSAT	Newtec ANT2035
Transmit Power	3W
EIRP	49.4 dBW (linear)
Emission Designator	257KG7W

Similarly, the VSATs will continue communicating with the Kacific 1 space station. While Kacific 1 is not yet on the Commission's approved space station list, a 30-day extension of special temporary authority to communicate with Kacific 1 would serve the public interest because:

(1) Kacific 1 currently seeks U.S. market access, and its application has been placed on public

¹ See 47 C.F.R. § 25.120.

² While the Commission originally granted ASTCA's STA requests in November 2021, IBFS no longer shows that the applications were granted. See IBFS File Nos. SES-STA-20210719-01076 (Ta'u) and SES-STA-20210719-01077 (Ofu); see also Appendix A (showing that original grants for IBFS File Nos. SES-STA-20210719-01076 and SES-STA-20210719-01077 commence Nov. 19, 2021). Therefore, out of an abundance of caution, ASTCA requests an extension of the original STAs.

³ ASTCA clarifies that it has filed separate requests for the Ofu and Ta'u locations but formatted this narrative to cover both requests. Both locations are therefore listed in this narrative.

⁴ See Appendix A (granting IBFS File Nos. SES-STA-20210719-01076 and SES-STA-20210719-01077); see also IBFS File Nos. SES-STA-20211220-01963, SES-STA-20211220-01964, SES-STA-20220113-00042, SES-STA-20220113-00043, SES-STA-20220214-00178, and SES-STA-20220214-00179 (requesting 30-day extension of STAs).

⁵ See Letter from John W. Castle, Counsel to ASTCA, to Marlene H. Dortch, Secretary, FCC, IBFS File Nos. SES-STA-20210719-01076 and SES-STA-20210719-01077, at 1 (Aug. 24, 2021).

notice;⁶ (2) Kacific 1 is licensed by Japan, which is a well-respected member of the International Telecommunication Union;⁷ and (3) Kacific 1 launched from Cape Canaveral, FL, in December 2019 on SpaceX's Falcon 9,⁸ which underwent safety, policy, and payload reviews to obtain its commercial space transportation license from the Federal Aviation Administration.⁹

The Commission may grant an STA upon a finding that: (1) extraordinary circumstances require temporary operations in the public interest, and (2) delay in the institution of these temporary operations would seriously prejudice the public interest.¹⁰

Such circumstances exist here. Since ASTCA filed its original STA applications,¹¹ ASTCA has been unable to schedule a cable repair ship. COVID-19 lockdowns, increased demand for broadband in multiple countries, and higher-priority emergency repairs on other Pacific islands have led to all available cable ships being fully scheduled since the cable break occurred. For example, a ship that ASTCA originally thought would be available in September 2021 became unavailable due to: (1) delays associated with an earlier-scheduled submarine cable project; and (2) scheduled maintenance at a dry dock in Singapore. More recently, a ship that ASTCA was trying to reserve was dispatched to repair Tonga's international and domestic cables, which were severely damaged following a volcanic eruption.¹² ASTCA has reached out to three separate companies (IT Telecom, Subcom, and Optic Marine) about reserving a ship. However, a ship that could provide the necessary technical services to successfully complete the cable repair currently will become available, at the earliest, in January 2023.

Additionally, ASTCA has experienced issues with obtaining the necessary equipment to complete the repair. While ASTCA already has spare submarine cables in stock, it requires beach manhole splice enclosures and splice kits. ASTCA continues to work on obtaining the equipment required to repair the cable.

⁶ See *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Public Notice, Report No. SES-02430 (Jan. 5, 2022) ("Kacific seeks to serve the U.S. market through a blanket authorization of earth stations in the U.S. territories of the Commonwealth of the Northern Mariana Islands and American Samoa.").

⁷ See Application of Kacific Broadband Satellites International Ltd. for U.S. Market Access, IBFS File No. SES-LFS-20210521-00824, Narrative at 2 (filed May 21, 2021) ("The Kacific-1 satellite is licensed by Japan.").

⁸ See Rachel Jewett, *Via Satellite*, "SpaceX Launch Delivers Payloads for Sky Perfect JSAT, Kacific," <https://bit.ly/3AUZOsp> (Dec. 17, 2019).

⁹ See Commercial Space Transportation License No. LLO 19-110 (Rev 2), <https://bit.ly/3uCUSSb> (eff. Nov. 8, 2019) (authorizing Space Exploration Technologies to conduct "[f]lights of Falcon 9 . . . from Launch Complex 39A at Kennedy Space Center . . . [to] transport[] a payload to a low Earth or geosynchronous transfer orbit"); see also FAA, *Getting Started with Licensing*, "Commercial Space Transportation Process – Site/Vehicle Operator License," <https://bit.ly/3yV5JMx> (last modified Sept. 18, 2021) (outlining the space transportation licensing process, including safety, policy, and payload reviews).

¹⁰ 47 C.F.R. § 25.120(b)(1).

¹¹ See IBFS File Nos. SES-STA-20210719-01076 (Ta'u) and SES-STA-20210719-01077 (Ofu).

¹² See, e.g., Morgan Winsor, *ABC News*, "Tonga's Undersea Cable May Take 'Weeks' to Repair After Volcanic Eruption," <https://abcn.ws/3rN4XAj> (Jan. 19, 2022).

Therefore, extraordinary circumstances require temporary operations so that ASTCA may continue providing service to the Manu'a Islands' roughly 1,400 residents. Specifically, the requested extension will serve the public interest by allowing ASTCA to provide residents basic communications services, including those for safety of life and emergency purposes, while ASTCA continues to attempt to repair the submarine cable and restore normal service.

APPENDIX A

Applicant: American Samoa Telecommunications Authority
File Number: SES-STA-20210719-01077
Call Sign: No Call Sign
Special Temporary Authority ("STA")

American Samoa Telecommunications Authority ("ASTCA") is granted a 30-day Special Temporary Authority (STA), commencing November 19, 2021, for its existing VSAT network system to communicate with the Japanese administration geosynchronous orbit ("GSO") Kacific satellite at the 150°E orbital location in the frequency bands 29600-29700 MHz (Earth-to-space) and 19800-19950 MHz (space-to-Earth) located at geographic coordinates 14° 10' 32.72"S/169° 37' 30.23"W in Ofu, AS due to complete service outage caused by broken marine fiber.

Operations shall be conducted under the following conditions:

- 1) Input power at antenna flange of 3 W, eirp of 49.4 dBW using antenna model NEWTEC ANT 2035 with emission designator 257KG7W.
- 2) Operations shall comply pursuant to 47 C.F.R. § 25.218(i).
- 3) Temporary operations shall be on center frequencies within frequency bands 29600-29700 MHz (Earth-to-space) and 19800-19950 MHz (space-to-Earth) that are authorized by the authorization of the requested space station.
- 4) Operations, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference.
- 5) In the event of any harmful interference under this grant of STA, ASTCA must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
- 6) Transmitter(s) must be turned off during antenna maintenance to ensure compliance with the FCC-specified safety guidelines for human exposure to radiofrequency radiation in the region between the antenna feed and the reflector.
- 7) The licensee shall take all necessary measures to ensure that antenna in operation does not create potential exposure of humans to radiofrequency radiation in excess of the FCC exposure limits defined in 47 CFR 1.1307(b) and 1.1310 wherever such exposures might occur. Measures must be taken to ensure compliance with limits for both occupational/controlled exposure and for general population/ uncontrolled exposure, as defined in these rule sections. Compliance can be accomplished in most cases by appropriate restrictions such as fencing. Requirements for restrictions can be determined by predictions based on calculations, modeling or by field measurements. The FCC's OET Bulletin 65 (available on-line at www.fcc.gov/oet/rfsafety) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alert signs and protective equipment for workers.

- 8) Grant of this authorization is without prejudice to any determination that the Commission may make regarding any of ASTCA's pending application or future applications.
- 9) Any action taken or expense incurred as a result of operations pursuant to this STA is solely at ASTCA's risk.

This action is issued pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. §0.261, and is effective upon release.

Applicant: American Samoa Telecommunications Authority
File Number: SES-STA-20210719-01076
Call Sign: No Call Sign
Special Temporary Authority ("STA")

American Samoa Telecommunications Authority ("ASTCA") is granted a 30-day STA, commencing November 19, 2021, for its existing VSAT network system to communicate with the Japanese administration geosynchronous orbit ("GSO") Kacific satellite at the 150°E orbital location in the frequency bands 29600-29700 MHz (Earth-to-space) and 19800-19950 MHz (space-to-Earth) located at geographic coordinates 14° 13' 24.88"S/169° 30' 40.69"W in Ta'u, Manu'a Islands, AS due to complete service outage caused by broken marine fiber. Operations shall be conducted under the following conditions:

- 1) Input power at antenna flange of 3 W, eirp of 49.4 dBW using antenna model NEWTEC ANT 2035 with emission designator 257KG7W.
- 2) Operations shall comply pursuant to 47 C.F.R. § 25.218(i).
- 3) Temporary operations shall be on center frequencies within frequency bands 29600-29700 MHz (Earth-to-space) and 19800-19950 MHz (space-to-Earth) that are authorized by the authorization of the requested space station.
- 4) Operations, shall not cause harmful interference to, and shall not claim protection from, interference caused to it by any other lawfully operating station and it shall cease transmission(s) immediately upon notice of such interference.
- 5) In the event of any harmful interference under this grant of STA, ASTCA must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event.
- 6) Transmitter(s) must be turned off during antenna maintenance to ensure compliance with the FCC-specified safety guidelines for human exposure to radiofrequency radiation in the region between the antenna feed and the reflector.
- 7) The licensee shall take all necessary measures to ensure that antenna in operation does not create potential exposure of humans to radiofrequency radiation in excess of the FCC exposure limits defined in 47 CFR 1.1307(b) and 1.1310 wherever such exposures might occur. Measures must be taken to ensure compliance with limits for both occupational/controlled exposure and for general population/ uncontrolled exposure, as defined in these rule sections. Compliance can be accomplished in most cases by appropriate restrictions such as fencing. Requirements for restrictions can be determined by predictions based on calculations, modeling or by field measurements. The FCC's OET Bulletin 65 (available on-line at www.fcc.gov/oet/rfsafety) provides information on predicting exposure levels and on methods for ensuring compliance, including the use of warning and alert signs and protective equipment for workers.

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